

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,) CASE NO. 3:18CR26
v.) JUDGE JAMES G. CARR
KARL ROGERS,) GOVERNMENT'S PROPOSED VOIR
Defendant.) DIRE QUESTIONS

Now comes the United States of America, by its counsel, Justin E. Herdman, United States Attorney, and Tracey Ballard Tangeman and Matthew D. Simko, Assistant U.S. Attorneys, and respectfully requests that the Court ask the following questions of prospective jurors during voir dire in this case:

- 1) Is there anyone here who does not own a computer or electronic device capable of accessing the internet?
- 2) Is there anyone here who has never used a computer before?
- 3) Anyone here think that they would simply be incapable of understanding any testimony whatsoever about computers or the internet?
- 4) Has anyone here ever used or gone on the dark web for any reason? If so, for what purpose?
- 5) Has anyone here ever used dark web networks like Tor or Freenet? If so, for what

purpose?

- 6) Does anyone think that it should not be a crime to download/receive child pornography?
- 7) Does anyone believe that the downloading, receiving, and/or viewing of previously produced child pornography should not be a crime?

Respectfully submitted,

JUSTIN E. HERDMAN
UNITED STATES ATTORNEY

/s/ *Tracey Ballard Tangeman*
/s/ *Matthew D. Simko*
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CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. All other parties, including a pro se defendant, will be mailed a copy via regular U.S. mail.

/s/ *Tracey Ballard Tangeman*
Tracey Ballard Tangeman
Assistant United States Attorney